

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff, 12 Civ. 6421 (KMK)

v.

**EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL**

Defendants

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

**[PROPOSED] ORDER GRANTING A TEMPORARY RETRAINING ORDER
AND ASSET FREEZE**

Upon the motion and supporting papers of the Securities and Exchange Commission (the “Commission”) for a temporary restraining order and asset freeze preventing Edward and Dawn Bronson from dissipating or otherwise liquidating their assets¹ whether held directly or indirectly:

IT IS HEREBY ORDERED that all persons and entities are temporarily restrained from liquidating assets owned or held for the benefit of Dawn or Edward Bronson whether (1) held in their names or individual capacity; (2) controlled by them; (3) they have any beneficial interest; (4) held by any of their affiliates, correspondent entities, or nominees; and (5) they have any

¹ This Order does not extend to assets that Ms. Bronson can show she owns entirely separately from Mr. Bronson and that she acquired with funds other than those earned by Mr. Bronson, to which Mr. Bronson has not contributed financially and to which Mr. Bronson has no claim.

other interest, whether in the United States or abroad including but not limited to the Cadillac Escalade used as the Bronsons' family vehicle.

IT IS HEREBY FURTHER ORDERED that assets owned or held for the benefit of Dawn or Edward Bronson whether (1) held in their names or individual capacity; (2) controlled by them; (3) they have any beneficial interest; (4) held by any of their affiliates, correspondent entities, or nominees including but not limited to V2IP, Inc., MacCallan Partners Assets LLC, Top Knot Inc. and Top Knot Inc. USA; and (5) they have any other interest, whether in the United States or abroad including but not limited to the Cadillac Escalade used as the Bronsons' family vehicle, are frozen.

IT IS HEREBY FURTHER ORDERED that any person or entity that receives notice of this Order shall not take any steps to encumber or in any way dissipate assets held by, on behalf of or at the direction of Edward or Dawn Bronson.

IT IS HEREBY FURTHER ORDERED that any person who receives actual notice of this Order by personal service or otherwise, and who holds, possesses or controls assets exceeding \$1,000 for the account or benefit of Defendant Edward Bronson and/or Dawn Bronson shall within five days of receiving actual notice of this Order provide counsel for the Commission with a written statement identifying all such assets, the value of such assets, or best approximation thereof, and any account numbers or account names in which the assets are held.

IT IS HEREBY FURTHER ORDERED that any person or entity receiving notice of this Order holding such monies and assets described above shall hold and retain within their control and prohibit the withdrawal, removal, transfer or other disposal of any such funds or other assets except as ordered by this Court.

IT IS HEREBY FURTHER ORDERED that any opposition papers shall be filed and served no later than _____, 202_. The Commission shall file and serve its reply by _____, 202_. If Bronson fails to file answering papers and/or appear, the Court may find him in default and enter an appropriate order against him at such time without further notice being given. If needed, the Court will set a hearing date.

IT IS HEREBY FURTHER ORDERED that this Court shall retain jurisdiction over this action for the purpose of implementing and carrying out the terms of all orders and decrees, which may be entered herein and to entertain any suitable application or motion for additional relief within the jurisdiction of this Court.

Dated: White Plains, New York

_____, 2022

UNITED STATES DISTRICT JUDGE